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7 Attorneys for Defendants

8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 GE ZHANG,

12 Plaintiff,

13 v.

14 KRISTI NOEM,<sup>1</sup> in her official capacity as  
15 Secretary of the United States Department of  
16 Homeland Security, *et al.*,

17 Defendants.

Case No. 3:24-cv-08428 RFL

**STIPULATION TO STAY PROCEEDINGS;  
[PROPOSED] ORDER**

18  
19 The parties, through their attorneys, hereby stipulate and respectfully request the Court to stay  
20 proceedings in this case for a limited time, until September 10, 2025. The parties make this joint request  
21 because they are pursuing an administrative resolution that may render further litigation of this case  
22 unnecessary.

23 1. Plaintiff filed this mandamus action seeking adjudication of his Form I-589, Application  
24 for Asylum and Withholding of Removal. United States Citizenship and Immigration Services  
25 (“USCIS”) scheduled an interview for May 13, 2025. USCIS will work diligently towards completing  
26

27 <sup>1</sup> Kristi Noem is automatically substituted as the defendant in this matter in accordance with  
28 Federal Rule of Civil Procedure 25(d).

1 adjudication of the I-589 application, absent the need for further adjudicative action or unforeseen  
2 circumstances that would require additional time for adjudication. If USCIS needs to reschedule  
3 Plaintiff's interview, USCIS will do its best to reschedule within four weeks of the initial appointment.

4 2. Plaintiff agrees to submit all supplemental documents and evidence to USCIS seven to  
5 ten days prior to the agreed upon scheduled interview. Plaintiff agrees that failure to timely submit this  
6 evidence may result in the rescheduling of the interview at no fault of USCIS.

7 3. If needed by Plaintiff or their dependent(s), Plaintiff shall bring their own interpreter to  
8 their asylum interview. See [https://www.uscis.gov/newsroom/alerts/affirmative-asylum-applicants-must-](https://www.uscis.gov/newsroom/alerts/affirmative-asylum-applicants-must-provide-interpreters-starting-sept-13)  
9 [provide-interpreters-starting-sept-13](https://www.uscis.gov/newsroom/alerts/affirmative-asylum-applicants-must-provide-interpreters-starting-sept-13). Plaintiff recognizes that failure to bring an interpreter to their  
10 interview may result in the interview being rescheduled at no fault of USCIS.

11 4. Upon receipt of the Asylum Office's decision, Plaintiff agrees to voluntarily dismiss the  
12 case.

13 5. The parties agree to bear their own litigation costs and attorney fees.

14 Accordingly, the parties stipulate and request that the proceedings in this case be stayed until  
15 September 10, 2025, at which time the parties will file a joint status report with the Court. At that time,  
16 the parties may request a further continuance of the stay of proceedings, dismissal of the litigation if  
17 appropriate, or placement of the case back on the Court's active docket. A stay of proceedings in this  
18 case will benefit the parties and conserve the Court's resources while the parties pursue a potential  
19 administrative resolution.

20 Dated: February 21, 2025

Respectfully submitted,<sup>2</sup>

21 ISMAIL J. RAMSEY  
22 United States Attorney

23 /s/ Elizabeth D. Kurlan  
24 ELIZABETH D. KURLAN  
25 Assistant United States Attorney  
26 Attorneys for Defendants

27 <sup>2</sup> In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all  
28 signatories listed herein concur in the filing of this document.


1 Dated: February 21, 2025

2 /s/ Anna Demidchik  
3 ANNA DEMIDCHIK  
4 Attorney for Plaintiff  
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**[PROPOSED] ORDER**

Pursuant to stipulation, IT IS SO ORDERED.

Date: February 24, 2025

  
RITA F. LIN  
United States District Judge